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IN THE

Supreme Court of the United States

OCTOBER TERM, 1966

No. 62

SAMUEL SPEVACK,
Petitioner,

v.

SOLOMON A. KLEIN,
Respondent.

On Writ of Certiorari To The Court of Appeals of the State of New York

AMICUS CURIAE BRIEF OF AMERICAN TRIAL LAWYERS ASSOCIATION

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STATEMENT OF AMICUS CURIAE AMERICAN TRIAL LAWYERS ASSOCIATION

The American Trial Lawyers Association respectfully submits that it is vitally interested in the Constitutional questions involved in this case, for the reasons hereinafter stated.

This brief is submitted pursuant to Rules 35 and 42 of the Revised Rules of this Court. Both Petitioner and Respondent have consented to the filing of this brief as amicus curiae, the consents having been filed with the Clerk of this Court.

The American Trial Lawyers Association is a national bar association with a current membership in excess of 25,000. Its prime function is to preserve the fundamental rights of men in their persons and property under law through the art of advocacy.

It is felt that the questions raised in this case present squarely the right of the legal profession to that independence necessary for it to function efficiently as an arm of the court, without fear of reprisal, asking no special considerations, but expecting the same Constitutional rights and protection accorded all other persons or groups of persons without discrimination.

The lawyer, traditionally, has been the protector of the rights of men, civil and criminal. When despotic governments have sought to stifle freedom and destroy property rights their first target has been the legal profession. Where the lawyers' status has been demeaned and his independence destroyed by fear of reprisal, the status of the judiciary has followed suit. Until recent times we felt that the debasing of human rights was ancient history, a condition which would never be repeated. It is being repeated now, in our time, in many areas of the world. Its corroding influence is contaminating.

The present case is one of a series which promises to become a flood if not halted, which seeks to place the American advocate in the unenviable position of being subjected to intimidation by certain organized groups who control most bar associations. Their weapon is insidious. Their argument is that the lawyer, because he has been characterized as an officer of the court, has no individual Constitutional rights as between himself and his superiors, the judges and the bar association committees.

The American Trial Lawyers Association does

not condone unethical practices, but it does condemn witch-hunting for the purpose of intimidating the trial bar. It seeks to police the conduct of its membership by as strict a code of ethics as is consonant with the rights of those requiring legal services.

The American Trial Lawyers Association seeks to be heard in this case because there is here demonstrated by concrete example the excesses to which overzealous brethen at the bar will go to destroy competing groups. By the device used in this case a lawyer may be faced with the choice of surrendering his Constitutional rights under the Fourth, Fifth, Sixth and Fourteenth Amendments, or, by asserting such rights, lose his livelihood by loss of the right to practice his profession. The Petitioner here has been disbarred by the courts of the State of New York because he relied on his Constitutional rights in refusing to submit to an inquisition by a judicial inquiry or to surrender his books and records.

QUESTIONS PRESENTED

1. Whether the disbarment of an attorney solely because of his refusal, based upon a good faith claim of the privilege against self-incrimination, to testify and to produce records before a State Judicial Inquiry is in violation of the self-incrimination clause of the Fifth Amendment, as applied to the States by the Fourteenth Amendment.

2. Whether, assuming the Fifth Amendment standard does not of itself preclude the disbarment of an attorney under such circumstances, the disbarment

is nonetheless a deprivation of due process of law or equal protection of the laws under the Fourteenth Amendment.

3. Whether a proceeding for disbarment instituted by a petition, alleging only generally acts of professional misconduct, without reference to specific acts, time, or place, is not void as a violation of the Sixth Amendment requiring confrontation by witnesses, the proceeding being dependent entirely on possibility of evidence to be obtained by search and seizure of the lawyer's records, in violation of the Fourth Amendment, or by requiring him to testify against himself, in violation of the Fifth Amendment.

STATUTES INVOLVED

The Fourth, Fifth, Sixth and Fourteenth Amendments to the Constitution of the United States are here involved, in addition to Special Rule V of the Supreme Court of New York, Appellate Division, Second Department, part of which are printed in Appendix E of the Petition for a Writ of Certiorari, and the remainder in Appendix A of this brief.

STATEMENT OF THE CASE

The factual statement of the case as set forth in Petitioner's Brief is adopted.

ARGUMENT

I. THE PRINCIPLE AT ISSUE IS OF NATIONAL IMPORTANCE

That the principle involved in this case is of critical importance to the trial bar is obvious. However, it is also of critical importance to our very form of government because of its implications.

For the same reason that the judiciary must remain inviolate, so must the practice of law. Is there any doubt in the minds of this highest court of our land why the Founders considered it necessary to include in the Constitution the provisions that the Judges, both of the Supreme and inferior courts, shall hold their offices during good behavior, and that their Compensation "shall not be diminished during their Continuance in Office?" (Art. III. Sec. 1)

It is because of these safeguards written into the Constitution that our federal judiciary is independent. Its independence is one of the bulwarks of our form of government. Neither a demanding executive nor a rampaging legislative branch has the power to influence forcibly the actions or decisions of the Court. For esentially the same reasons the bar of the United States should be free and independent. Through it, matters of vital importance to our lives, liberty, property and happiness come before the courts. And that branch of the bar which may most accurately be designated as the arms or officers of the court are that great body of advocates, the trial lawyers of America. It is they who

defend the accused and lend their services to establish, maintain and protect the rights of our people in their many forms of contact with each other and with the sovereign.

If the advocate is permitted to be intimidated by an opposing segment of the bar without the right to the protection of the Constitution afforded even the vilest criminal, we are indeed sowing the seeds for the decay of our constitutional system in its present form. Unpopular causes will find few courageous enough to risk the wrath of the majority of the organized bar by exposing themselves to loss of reputation or profession, with attendant disgrace to their families, and loss of means of a livelihood which follows disbarment.

Of what value then is an independent judiciary if those through whom it must function dare bring before it only matters involving rights and principles which are approved by the popular hysteria of the moment, or by the entrenched majority groups of the bar associations who control the machinery of the bar and can whip into line any dissident elements of the bar by threat of judicial inquiry? To many of that aristocracy of the bar the democratic system is a necessary evil. By them this Court is villified because of its adherence to the philosophy of the most sublime document ever devised by the mind of man, the Constitution of the United States. Those of the Bar who espouse the basic rights of free men on Constitutional grounds are considered radical and viewed with contempt by the ruling groups.

II. THE JUDICIAL INQUIRY IS A THINLY DISGUISED FORM OF ATTACK ON THE CONTINGENT FEE SYSTEM.

By far the greatest volume of litigation in our courts today involves one branch or another of tort law. In this field of the law justice is a tangible thing to the multitude. By far the greatest percentage of the injured and the maimed, and the widow and the orphan of the wrongful death victim, are indigent or unable to afford the luxury of retaining counsel on a flat-fee basis. The life-line extended by the legal profession to these millions of victims of the carnage wrought by our mechanized, jet, atomic form of society is the contingent fee system.

Using possible abuse of the contingent fee system, and the theory that the lawyer is an officer of the court, as legalistic justification, the courts of New York are being used as one of the springboards for a national campaign to destroy the contingent fee system. If the plaintiff's advocate can be kept under pressure, the first step toward this end will lead but to the next, toward its final destruction by default.*

III. THE JUDICIAL INQUIRY SYSTEM ENCOURAGES ANONYMOUS AND IRRESPONSIBLE HARASSMENT AND VIOLATES THE FOURTH, FIFTH AND SIXTH AMENDMENTS

*See attack on contingent fee system by James S. Kemper, Jr., speech delivered at Williamsburg, Va., June 6, 1966, excerpt, XIV Virginia Bar News, No. 8, p .4.

In a great city where, by the law of averages, some abuses must occur, a major step has been taken. That ancient device of intimidation, know as the "Judicial Inquiry", has been resurrected. Upon petition to the Kings County Supreme Court, initiated by a petition, *based upon "information and belief,"* subpoena may be directed to any lawyer in its jurisdiction to produce *carte blanche,* financial records and "all other deeds, evidence and writings, which you have in your custody or power, concerning the premises," for any fixed period, upon pain of disbarment for failure to produce and testify against himself. (Tr. pp. 1-2)

The imposing title of such petition in this case is, "The Petition of the Brooklyn Bar Association for A Judicial Inquiry by the Court into Certain Alleged Illegal, Corrupt and Unethical Practices and of Alleged Conduct Prejudicial to the Administration of Justice . . . ", pursuant to Section 90 of the Judiciary Law. The petition alleges *nonspecific, shotgun type violations* of the rules of court and of *the code of ethics,* in general terms[1], *depending for proof entirely on the alleged right to force a lawyer to produce evidence against himself and to testify against himself.*

The irony is that the legal profession, by that same "code of ethics", must advise a client of his privilege not to produce evidence against himself or to testify against himself. But to destroy the very right which the lawyer is honor and duty-bound to espouse to the utmost of his ability, that branch of the profession opposed to the contingent fee system is willing to risk destruction of the freedom and independence of the en-

[1]Transcript, pp. 8-9

tire legal profession. This, it follows, must ultimately leave the judiciary impotent to carry out its great duty of enforcing the guarantee to every man of the protection of the Constitution which it now enjoys.

In this self-destructive role the New York bar group has had nurture in the decisions of this court in *Konigsberg* v. *California*,[2] and *Cohen* v. *Hurley*[3]. Fortunately for posterity is the system which guarantees the independence and fearlessness of our Federal judiciary, and particularly fortunate are we in the choice of the men who have had the conscience and the ability eloquently to voice their dissents from the rulings of the majority, for future events have often proved the wisdom of the great dissenters. Thus, in classic tradition we have the clairvoyant dissent of Justice Black in *Hurley*.

The sweeping nature of the subpoena in this case strikes at the very foundation of the constitutional guaranty of the Fourth Amendment against unreasonable searches and seizures. *Schwimmer* v. *United States*, (CA 8, 1956) 232 F 2d 855, 860, certiorari denied 77 S.Ct. 48, 352, U.S. 833, 1 L. ed 2d 52; *Boyd* v. *United States*, 116 U. S. 616, 622, 6 S. Ct. 524, 29 L. ed 746; *Hale* v. *Henkel*, 201 U. S. 43, 50 L. ed. 652, 26 S.Ct. 370. In the *Hale* case it was held that the subpoena duces tecum served on Hale as secretary of MacAndrews & Forbes Co. in an anti-trust proceeding was far too sweeping in its terms and violated the test of reasonableness, an unreasonable search and seizure under the Fourth Amendment.

2366 U.S. 36 (1961)
3366 U.S. 117, 123 (1961)

Granting a carte blanche subpoena to any grand jury or bar association *on suspicion* to compel production of a lawyer's books, records and personal papers violates the test of reasonableness. It can proceed only on theory that the end justifies the means, a moral concept always condemned by this court. To permit such procedure requires a lawyer to become a witness against himself in what amounts to a criminal case.

IV. THE PUNISHMENT IS OF A CRIMINAL NATURE

While there may be specious argument seeking to differentiate between loss of reputation· property rights and the right to the pursuit of happiness on the one hand, and actual physical incarceration or a fine on the other, it must be conceded that the difference is purely semantics, a play on words. Honesty and justice demand that we recognize truth, and the truth is that there is no material difference between punishment by disbarment of a lawyer and a horrendous fine. Where a lawyer with years of investment in building up a lucrative law practice has had it snatched away, the penalty is horrendous. And in order not to be misunderstood, the definition of "horrendous" is, "To be regarded with horror; dreadful; terrible; horrible." (The Century Dictionary). It is in a class by itself as a cruel and unusual punishment. This Court has held that "exclusion from any of the professions . . . for past conduct can be regarded in no other light than as punishment for such conduct." Ex Parte *Garland,* 4 Wall, 333, 377; see *Cummings* v. *Missouri,* 4 Wall, 277, 322; *In re Leszynsky,* 16 Blatch, 19, F. C. 8, 279.

The nature of the punishment is graphically described by Justice Black in *Hurley* at pages 145, 148, 153 of 366 U. S.

What Justice Black feared in his dissent in *Cohen* v. *Hurley,* supra, has now come to pass. In that case, a proceeding similiar to this, Cohen refused to testify or to produce records. He invoked his state constitutional privileges. The penalty was discipline by the New York Appellate Division in the form of disbarment. He was disbarred, not because he invoked his constitutional privilege against self-incrimination, but rather, because he deliberately refused to cooperate with the Court by refusing to waive his constitutional privilege. 366 U. S. at page 122.

Such argument seeks to divide the lawyer into two beings, a man who has all the rights of free men, and a lawyer, a being with limited rights.

Such attempted division is merely a legalistic tool or theory in defiance of the Constitution. And to confound logic further, the majority there based its decision on common law practices, practices which helped bring on the American Revolution. 366 U.S. n. 15 at p. 139; d., pp. 140, 142.

Fine distinctions have often been drawn between a right and a privilege. Many decisions, among them some relied on by the majority in *Hurley* have held that a lawyer practices his profession by sufferance. Up to this point this had been true. We now ask this most august tribunal to declare that once a person has

been qualified to practice law and has been made a member of the bar, such membership becomes a right, to be lost only by due process of law, and not by the whim or caprice of any bar group or court based on transient concepts of ethics or morality. See Justice Black's dissent in *Hurley,* 366 U.S. at p. 147.

The majority in *Hurley* said, at 366 U.S., page 125:

> "Basic to consideration of this aspect of petitioner's case is the fact that the State's disbarment order was predicated, not upon any unfavorable inference which it drew from petitioner's assertion of the privilege . . . nor upon any purpose to penalize him for its exercise, but solely upon his refusal to discharge obligations which, as a lawyer, he owed the Court."

All that the majority here says, in *Hurley,* in redundant language, is that Cohen was penalized for pleading his constitutional rights. The dignity of the law was then vindicated by his destruction as a lawyer. The destruction was accomplished by weighing the importance of the Constitution against the theory that a lawyer is an "officer of the court". Being such "officer", he must be like Caesar's wife, above suspicion. Is this of sufficient importance under our Constitutional scheme of things to create constitutional exceptions? A hole in the dyke weakens the dyke.

That a Court or a bar group might be hindered in a witch-hunting purpose should be of no greater importance in the eyes of the law than efforts to con-

vict alleged traitors, communists, or felons. All attempts to enforce the law are of importance, some of greater and others of lesser degree. Never is the importance of attaining conviction great enough to justify the suspension of the basic liberties guaranteed by the Bill of Rights, as this Court has so clearly announced in all its recent constitutional decisions. Exceptions carry great danger to our constitutional system, for once the precedent is established the floodgates will be opened.

We, therefore, humbly submit that the Court weigh with greatest consideration, the words of Justice Black in his scholarly and documented dissent in *Hurley* (366 U.S., at page 138):

> "I heartily agree with the view expressed by the majority that lawyers occupy an important position in our society, for I recognize that they have a great deal to do with the administration, the enforcement, the interpretation and frequently even with the making of the Constitution and the other laws that govern us. But I do not agree with the majority that the importance of their position in any way justifies a discrimination against them with regard to their basic rights as individuals. Quite the contrary, I would think that the important role that lawyers are called upon to play in our society would make it all the more imperative that they not be discriminated against with regard to the basic freedoms that are designed to protect the individual against the tyrannical exertion of

governmental power. For, in my judgment, one of the great purposes underlying the grant of those freedoms was to give independence to those who must discharge important public responsibilities. The legal profession with responsibilities as great as those placed upon any group in our society, must have that independence. If it is denied them, they are likely to become nothing more than parrots of the view of whatever group wields governmental power at the moment. Wherever that has happened in the world, the lawyer, as properly so called and respected, has ceased to perform the highest duty of his calling and has lost the affection and even the respect of the people."

"Nor do I believe, as the majority asserts, that the discrimination here practiced is justified by virtue of the fact that the courts of England have for centuries exercised disciplinary powers 'over members of the bar, incident to their broader responsibility for keeping the administration of justice and the standards of professional conduct unsullied.' The rights of lawyers in this country are not, I hope, to be limited to the rights that English rulers chose to accord to their barristers hundreds of years ago. For it is certainly true that the courts of England could have then, as the majority points out, made 'short shrift' of any barrister who refused to 'cooperate' with the King's courts. Indeed, those courts did sometimes make 'short shrift' of lawyers whose greatest crime was to dare to

defend unpopular causes. And in much the same manner, these same courts were at this same time using their 'inherent' powers to make 'short shrift' of juries that returned the wrong verdict. History, I think, records that it was this willingness on the part of the courts of England to make 'short shrift' of unpopular and uncooperative groups that led, first, to the colonization of this country, later, to the war that won its independence, and finally to the Bill of Rights."

And, at 366 U.S., page 143, he continued:

"It is, of course possible that the majority will allow this process to go no further—that it will not disturb the few remaining constitutional safeguards of the lawyer's independence. But I find no such promise in the majority's opinion. On the contrary, I find in that opinion a willingness to give overriding effect to the lawyer's duty of 'cooperation', even to the destruction of constitutional safeguards, and I cannot know how many constitutional safeguards would be sacrificed to this doctrine. Could a lawyer who refused to 'cooperate' now be subjected to an unlawful search in an attempt to find evidence that he is guilty of something that a judge might later find to constitute 'shady practices'?"

V. COHEN V. HURLEY CAN NO LONGER BE SUPPORTED ON CONSTITUTIONAL GROUNDS

In *Mallory* v. *Hogan,* 378 U.S. 1, 8, this Court held that "The Fourteenth Amendment secures against State invasion, the Fifth Amendment guarantees against Federal infringement—the right of a person to remain silent unless he chooses to speak in the unfetted exercise of his own will, and to suffer no penalty for so doing, as held in *Twining*[4], for such silence.

Peculiarly appropriate here is Justice Brennan's statement in *Malloy,* at page 8, relating to the overturning of the principle of *Wolf* v. *Colorado,* 388 U.S. 25, by *Mapp* v. *Ohio,* 367 U.S. 643:

> "We relied upon the great case of *Boyd* v. *United States,* 116 U.S. 616, decided in 1886, which, considering the Fourth and Fifth Amendments as running 'almost into each other', id., at 630, held that 'Breaking into a house and opening boxes and drawers are circumstances of aggravation; *but any forcible and compulsory extortion of a man's own testimony or of his private papers to be used as evidence* to convict him of crime or *to forfeit his goods,* is within the condemnation of [those Amendments] . . . " (Italics added)

Having thus adverted to the purity of reasoning dictated by Boyd, the next step was inevitable. Re-

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[4]*Twining* v. *New Jersey,* 211 U.S. 78

viewing the extension of the guaranties of the First, Fourth and Sixth Amendments to the States[5], Justice Brennan, in the majority opinion, at page 10, continues:

> "The Court thus has rejected the notion that the Fourteenth Amendment applies to the States only a 'watered-down, subjective version of the individual guarantees of the Bill of Rights'. *Ohio ex rel Eaton* v. *Price,* 364 U.S. 263, 275 (dissenting opinion). If *Cohen* v. *Hurley,* 366 U.S. 117, and *Adamson* v. *California, supra suggest such an application of the privilege against self-incrimination, that suggestion connot survive recognition of the degree to which the Twining view of the privilege has been eroded. What is accorded is a privilege of refusing to incriminate one's self and the feared prosecution may be by either federal or state* authorities". (Italics added).

This view reduces the problem to its lowest denominator. The appellant here, Spevack, is entitled to the *full* protection of the Constitution against the New York attack. Only by abandoning consistency can it now be held that Spevak, as an individual, cannot be punished in any manner for refusing to submit to un-

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[5] *Gitlow* v. *New York*
Cantwell v. *Connecticut*, 310 U.S. 296 (First Amendment)
Louisiana ex rel Gremillion v. *NAACP*, 366 U.S. 293, the prohibition of unreasonable search and seizure of the Fourth Amendment.
Ker v. *California*, 374 U.S. 23, and the right to counsel guaranteed by the Sixth Amendment.
Gideon v. *Wainwright*, 372 U.S. 335

reasonable searches and seizures and for refusing to testify against himself under the protection of the Constitution, but Spevack, the lawyer, may not avail himself of such protection.

Only a "watered-down, subjective version of the individual guarantees of the Bill of Rights" would result should the Court, having thus repudiated *Hurley,* avoid such repudiation by creating an exception, almost before the ink is dry on the decision. It would inevitably lay the groundwork for repudiation through additional exceptions.

This being the first true test of principle of *Malloy* it is urged that the Court stand fast to discourage further attack.

Any suggestion that an advocate be denied the equal protection of the Constitution should be rejected as a form of discrimination, amounting to a betrayal of the basic purposes of the Founders in creating a written constitution guaranteeing equal protection to all.

VI. GENERAL ALLEGATIONS AMOUNT TO INDICTMENT WITHOUT EVIDENCE—A DENIAL OF THE RIGHT TO BE CONFRONTED BY WITNESSES

Here there are no specific allegations which should be alleged in an indictment, no specific time, place or charge. In a case of this type the lawyer is not only deprived of his rights under the Fourth and Fifth Amendments but by asserting his right to them, he

loses the benefit of the Sixth. In *Gideon* v. *Wainwright*, 372 U.S. 335, it was held that the Fourteenth Amendment makes the Sixth Amendment's guarantee of the right to counsel obligatory upon the States. *Pointer* v. *Texas,* 380 U.S. 400, 401 (1965). The *Pointer* case then went on to decide "that the Sixth Amendment's right of an accused to confront the witnesses against him is likewise a fundamental right and is made obligatory on the States by the Fourteenth Amendment."

Adherence to *Hurley* would render nugatory the progress achieved in *Malloy* v. *Hogan,* supra, *Gideon* v. *Wainwright,* supra, *Pointer* v. *Texas,* supra, because the result is that lawyers, as a class, would be deprived, not only of a fair trial, but of any trial at all, merely by the expedient of general allegations with no witnesses, no confrontation, and a resulting implied verdict of guilty if the lawyer fails to produce the evidence to prove his innocence. This is a return to trial by ordeal more appropriate to the Peoples' Courts of conquering dictators than under the Constitution of the United States.

CONCLUSION

The great and vital concern of the organized trial lawyers of America in submitting this amicus curiae brief is that our judicial system remain free and independent, truly an arm of the court and officers of the court, to the end that:

1. No rumor, or slander, or baseless accusation be permitted to undermine that position;

2. That all charges be based upon documented fact;

3. That no carte blanche authority be given any board of inquiry to pry into private affairs without due process of law;

4. That the tyranny of the majority be restrained within constitutional bounds for the preservation of our freedom in a positive rather than a theoretical manner;

5. That their independence may be maintained in order that they may continue to function as the voice and protector of all causes, popular and unpopular, at all times, without fear of retribution.

Edward Alexander[6], in comparing the doctrines of humanism and liberalism, in a warning against despotism, said:

> "In his 1840 review of *Democracy in America,* Mill expounded Tocqueville's doctrine of the Tyranny of the Majority. This peculiarly American plan of tyranny, Mill said, was exercised less over the body than over the mind. In America, the land of freedom and of great intellectual activity on the part of the individual, less independence of thought existed

[6]Edward Alexander, 1965, Columbia University Press, New York and Routledge and Kegan Paul, London, p. 228.

than in any other country. For when the collective voice of the majority in America had made up its mind about a question, hardly a single American dares to question its conclusion. Having rejected the authority of the past, of the philosopher, of the priest, Americans prostrated themselves before the God of public opinion. Each American found himself incapable of imagining that an enormous mass of individuals all very much like himself could be in the wrong. Mill feared that America, for want of a strong sense of resistance to popular will, would fall under the tyranny of the majority."

This Court, from its earliest days, has been that strong center of resistance to the tyranny of the majority, the tyranny of the transient popular will, as expressed by de Tocqueville. It has fully justified the judgment of its founders in placing its justices above the power of that transient popular will. In this case of transcending importance to the American people it is prayed that the Court will see its way clear to continue in that role, that it will strike down all efforts to make impotent the legal profession by placing it without the pale of constitutional protection.

The American Trial Lawyers Association prays:

1. That the judgment of the New York Court of Appeals be reversed.

2. That petitioner, Samuel Spevack, be reinstated as a member of the Bar of the State of New York.

3. That the doctrine of *Cohen* v. *Hurley* be repudiated.

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